

JENNER & BLOCK LLP

Barbara S. Steiner
Tel 312 923-2611
Fax 312 840-7611
bsteiner@jenner.com

The Honorable George H. Wu
United States District Court for the Central District of California
312 North Spring Street
Los Angeles, CA 90012-4701

Pursuant to the Master Discovery Protocol, I write on behalf of defendants Nomura Home Equity Loan, Inc. and Nomura Asset Acceptance Corp. (together, “Nomura”) to request the Courts’ assistance with resolving a scheduling issue concerning a third party witness, CoreLogic, Inc. (“CoreLogic”).

On June 17, 2015, Nomura issued two subpoenas to CoreLogic for the production of documents (on July 6, 2015) and to testify at a deposition (on July 10, 2015), respectively. The subject matter of those subpoenas is limited to the “HistoryPro” product and service that CoreLogic provided to Nomura in 2006 and 2007. HistoryPro is intended to accurately grade collateral risk by analyzing factors that are predictive of the types of fraud that contribute to early payment default and loan loss. Accordingly, HistoryPro’s design, principles, and technology — including the operation, features, and reliability of HistoryPro — are important to Nomura’s defenses here because, as the Courts are aware, plaintiff National Credit Union Administration (“NCUA”) is alleging that Nomura failed to conduct proper valuation diligence on loans.

cc: Counsel of Record (via ECF)